

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
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FELICIA ALTERESCU,

Plaintiff,  
-against-

NEW YORK CITY DEPARTMENT OF  
EDUCATION; RICHARD CARRANZA,  
CHANCELLOR; and THE UNITED  
FEDERATION OF TEACHERS

**NOTICE OF MOTION**

Case No. 21-CV-00925-KPF

Defendants.  
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law  
in Support of the Motion to Dismiss the Complaint as to Defendant United Federation  
of Teachers (“UFT”), the Declaration of Paul K. Brown, with exhibits annexed thereto,  
and all prior proceedings had herein, Defendant UFT will move this Court, Honorable  
Katherine Polk Failla, U.S.D.J., at the United States Courthouse, 40 Foley Square,  
New York, New York 10007, on a date to be determined by the Court, for an Order,  
pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the Complaint as to  
Defendant UFT with prejudice, and granting such other and further relief as the Court  
deems just and proper.

Dated: New York, New York  
October 6, 2021

Respectfully submitted,

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